

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LINDA TAYLOR
Plaintiff

§ CIVIL ACTION NO.
§ 4:12-CV-01975
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§
§

Vs.

TEXAS SOUTHERN UNIVERSITY
Defendant

PLAINTIFF'S INITIAL DISCLOSURES

Plaintiff, Linda Taylor, in compliance with Rule 26(a)(1) of the Federal Rules of Civil Procedure, submits the following initial disclosures to the Plaintiff.

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information — along with the subjects of that information — that the disclosing party may use to support its claims or defenses.

The following individual(s) are also likely to possess discoverable information:

1. Linda Taylor - Plaintiff
c/o Peggy J. Lantz
Lorri Meraz Grabowski
Law Office of Peggy J. Lantz
10497 Town & Country Way, Ste 700
Houston, Texas 77024

Ms. Taylor has information regarding the allegations made the basis of this lawsuit.

Others connected with Texas Southern University:

The following are individuals presently or formerly employed by TSU who are likely to have discoverable information; each was employed during Plaintiffs employment with TSU. Each should be contacted through Darren Gibson, Assistant Attorney General, General Litigation Division, P.O. Box 12548, Capitol Station, Austin, Texas 78711-2548; (512) 463-2120:

2. Lillian Poats - Dean of the College of Education
Texas Southern University
3100 Cleburne St.
Houston, TX 77004

Dean Potts has information regarding Plaintiffs' complaints as well as her reactions to the complaints and subsequent actions of harassment, including removing Plaintiff from the CBA

position and placing her in the position of Administrative Assistant in the Department of Health and Kinesiology, and subsequently terminating Plaintiffs' university employment.

3. Marie Horton - former Interim Chair of the Department of Health and Kinesiology

Ms. Horton retired August 31, 2012. She has information regarding Plaintiffs' work environment, numerous acts of harassment against Ms. Taylor and subsequent termination of Plaintiffs university employment.

4. Keisha David - Associate Director

Employee Relations and Compliance - Human Resources Office
Texas Southern University
3100 Cleburne St.
Houston, TX 77004

Ms. Davis has information regarding Plaintiffs internal complaints alleging discrimination and harassment, Plaintiffs requests for FMLA leave and medical leave. She also has information regarding lack of follow up or investigations of Ms. Taylor's complaints, and the termination Plaintiffs university employment.

5. Sanya Sinclair, Human Resources Generalist
Texas Southern University

3100 Cleburne St.
Houston, TX 77004

Ms. Sinclair has information regarding Plaintiffs internal complaints alleging discrimination and harassment and TSU's lack of follow up and investigation of the allegations.

6. Brian Dickens, Executive Director of Human Resources
Texas Southern University
3100 Cleburne St.
Houston, TX 77004

Mr. Dickens has information regarding the university's response to Plaintiffs safety concerns and the rationale for termination of Plaintiffs university employment.

7. Van Le - Human Resources Representative II (Benefits)
Texas Southern University

3100 Cleburne St.
Houston, TX 77004

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Ms. Le has information regarding Plaintiffs request for FMLA leave, medical leave and return to work.

8. Derrick Wilson - Interim College Business Administrator (CBA), College of Education
Texas Southern University

3100 Cleburne St.
Houston, TX 77004

Mr. Wilson has information regarding his appointment as the College CBA and his job duties and responsibilities as CBA and his lack of experience and qualifications for the CBA job at the time Ms. Taylor was demoted.

9. Ron Cornelius, Internal Auditor
Texas Southern University
3100 Cleburne St.

Houston, TX 77004

Mr. Cornelius has information regarding the Administrative Change Audit conducted in the College of Education during 2011, and the findings regarding the slow payment of invoices, travel reimbursements, and improper cash controls as well as his suspicions regarding his investigations relating to the motivation of the audits.

10. Charla Parker-Thompson, Director Internal Audit
Texas Southern University

3100 Cleburne St.
Houston, TX 77004

Ms. Parker-Thompson has information regarding the Administrative Change Audit conducted in the College of Education during 2011, and the findings regarding the payment of invoices, travel reimbursements, and cash controls.

11. Roy L. Onstott, Mold Assessment Consultant - Honesty Environmental Services, Inc.
6647 Maynard Road

Houston, Tx 77041
(713)856-5354

Mr. Onstott has information regarding the mold assessment conducted in the university's Health and Physical Education Building.

12. Kamal Hussein, Executive Vice President - Honesty Environmental Services, Inc.
6647 Maynard Road

Houston, Tx 77041
(713) 856-5354

Mr. Hussein has information regarding the mold assessment conducted in the university's Health and Physical Education Building.

13. The Board of Regents of Texas Southern University, as a corporate body and individually, before whom Plaintiff appeared several times to advocate on matters of interest to the public.

Plaintiff's Treating Physicians

14. Mickey V. Bush, M.D.
3424 FM 1092, Ste. 220
Missouri City, Tx. 77459
(281)208-3322

(281) 208-3393 fax

As one of Plaintiff's treating physicians, Dr. Bush has information regarding Ms. Taylor's medical condition, her disability and the medical notices submitted to the University on behalf of Plaintiff.

15. MPCA - Methodist Hospital
P.O. Box 4719

Houston, Tx. 77210-4719
(713)441-4347

The hospital where plaintiff was treated. There may be records regarding Ms. Taylor's medical condition, and alleged disability.

16. Lewis A. Brown, M.D.
Southwest Asthma & Allergy

12606 West Houston Center Blvd., Ste. 260

Houston, Tx. 77082
(281)531-4901

15400 Southwest Freeway, Set. 125
Sugarland, Tx. 77478
(281)242-0131

17. All other individuals listed in Defendant's initial disclosures, some of whom are previously listed herein.

- B. **Copy of, or description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the Plaintiff, which may be used to support Plaintiff's claims.**

The following documents, data compilations, and tangible things, by category and location, are in the possession, custody, or control of Plaintiff:

- Personal records for Ms. Taylor, including but not limited to records regarding complaints of discrimination and retaliation against Plaintiff and Plaintiffs time, attendance, sick leave, and FMLA leave;
- Emails sent and received by Plaintiff regarding her allegations;
- Letters sent and received by Ms. Taylor regarding her allegations;
- Documents pertaining to Plaintiffs FMLA leave;
- Documents received from the EEOC and/or TWC relating to Plaintiffs charges of discrimination;
- Documents and other electronic stored information (ESI), if any, pertaining to Ms. Taylor's investigation and documentation of improprieties and failings in the administration of the Texas Southern Education Department.

C. Computation of Damages.

Ms. Taylor's damages are continuing, and an initial computation will be prepared and provided to Defendant when that initial computation is completed. The categories of damages include lost pay and benefits, physical and emotional distress, cost of medical services and medications, damages to Ms. Taylor's reputation, damages to Ms. Taylor's earning capacity, and damages to Ms. Taylor's enjoyment of life. Ms. Taylor will also make claim for attorney's fees and costs of this litigation.

D. Insurance agreements.

None have been identified by Plaintiff.

Respectfully submitted,

Peggy J. Lantz

/s/ Peggy J. Lantz

State Bar No. 24002452

Southern District Number 22699

10497 Town & Country Way, Ste. 700

Houston, Texas 77024

Telephone: 832-242-6222

Facsimile: 832-204-4242
Email: peggylantz@lantzlaw.com

CERTIFICATE OF SERVICE

I certify that the above submission was served on the attorney-in-charge for the defendant, utilizing the court's ECF service, on this 30th day of November, 2012.

/s/ Peggy J. Lantz
Peggy J. Lantz
Attorney-in-Charge for Plaintiff